

JUSA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

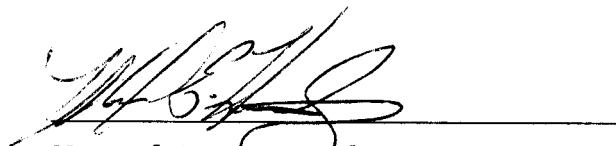
07 MJ 8928

UNITED STATES OF AMERICA) MAGISTRATE CASE No: _____
)
 Plaintiff,) COMPLAINT FOR VIOLATION OF
 v.) 8 U.S.C. § 1324(a)(2)(B)(iii)
) Bringing In Illegal Aliens
 Natalie Sofia PIEDRA Molina) Without Presentation (Felony)
)
 Defendant.)
 _____)

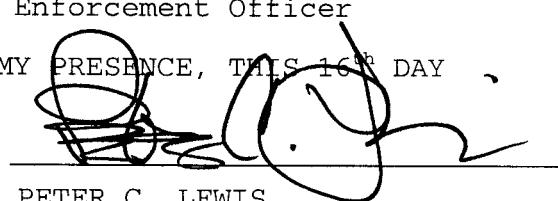
12 The undersigned complainant, being duly sworn, states:
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14 That on November 15, 2007, within the Southern District of
 California, defendant Natalie Sofia PIEDRA Molina, with the intent to
 violate immigration laws of the United States, knowing and in
 reckless disregard of the fact that one alien, namely, Manuel
 VALENZUELA, had not received prior official authorization to come to,
 enter and remain in the United States, did bring to the United States
 said alien and upon arrival did not bring and present said aliens
 immediately to a Customs Border Protection Officer at the designated
 port of entry; in violation of Title 8, United States Code, Section
 1324(a)(2)(B)(iii).

18 And the complainant states that this complaint is based on the
 19 attached Statement of facts, which is incorporated herein by
 reference.

21 
 22 Merced E. Hernandez, CBP
 Enforcement Officer

23 SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 16th DAY
 24 OF NOVEMBER 2007.

25 
 26 PETER C. LEWIS
 U.S. MAGISTRATE JUDGE
 27
 28

UNITED STATES OF AMERICA

V.

Natalie Sofia PIEDRA Molina

STATEMENT OF FACTS

The complainant states that this complaint is based upon the reports of the apprehending officers and the investigation conducted by United States Customs & Border Protection Enforcement Officer Merced E. Hernandez.

On November 15, 2007, at approximately 11:15 A.M., Natalie Sofia Piedra Molina arrived at the Calexico, California, West Port of Entry, as the driver of a 1999 Ford Contour.

During the primary inspection, Natalie Sofia PIEDRA Molina gave a negative Customs declaration to the primary United States Customs and Border Protection Officer (CBPO) Kathy Rivera. CBPO Rivera asked her for her citizenship and her children's where she produced California birth certificates for her minor children and stated orally she was a United States Citizen. CBPO Rivera asked her who owned the vehicle and PIEDRA Molina stated that it belonged to her. CBPO Rivera asked PIEDRA Molina for the reason she visited Mexico in which she stated was to visit her sick grandmother who was in the hospital in Mexicali, Mexico. CBPO Rivera asked her to open the trunk in which CBPO Rivera noticed a soap like smell. CBPO Rivera then opted to refer the vehicle to Secondary for further inspection.

In secondary inspection United States Customs and Border Protection Officer(CBPO) Hadley Newgent instructed the driver PIEDRA Molina where to park, he asked her for a Customs Declaration and she stated “no” she wasn’t bringing anything back. CBPO Newgent looked under the vehicle and observed a false compartment in the undercarriage. CBPO Newgent escorted PIEDRA Molina and her minor children to the Vehicle Secondary Office for further inspection. CBPO Newgent with the assistance of CBPO Luis Garcia and CBPO Alfonso Gordon proceeded to the vehicle lift where the vehicle was examined. There it was

1 discovered one male undocumented alien later identified as Manuel VALENZUELA, in a non
2 factory compartment located under the rear seat of the vehicle. VALENZUELA was removed
3 from the vehicle. PIEDRA Molina and VALENZUELA were taken to the Port Enforcement
4 Team for further disposition.

5 Material Witness VALENZUELA stated he is a citizen and national of Mexico with no legal
6 entry documents to enter, reside or pass through the United States. VALENZUELA stated he
7 had made the smuggling arrangements with an unknown male to have him smuggled into the
8 United States illegally. VALENZUELA stated was told that once he crossed he would have to
9 pay \$3,500.00 for being smuggled into the United States and his final destination was to be
10 Long Beach, CA were he was to seek employment and resume residency of 10 ½ years. When
11 presented with a photo line-up PIEDRA Molina he was unable to identify PIEDRA Molina.
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13

14 Material Witness:

15 Name

Country of Birth

16 Manuel VALENZUELA

MEXICO

17
18 Further, the complainant states that he believes said alien is a citizen of a country other than
19 the United States; that said alien has admitted that he is deportable; that his testimony is
20 material, that it is impracticable to secure his attendance at the trial by subpoena; and he is a
21 material witness in relation to this criminal charge and should be held or admitted to bail
22 pursuant to Title 18, United States Code, Section 3144.
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